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7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE DISTRICT OF ARIZONA

9 IN RE: Bard IVC Filters Products Liability
10 Litigation,

No. 2:15-MD-02641-DGC

11 **[PROPOSED] CONSENT ORDER**

12 Upon consideration of the parties' Joint Motion for an Order Protecting Any
13 Attorney-Client Privilege and Work Product Revealed During Upcoming Motion for
14 Protective Order, the motion is hereby granted.

15 In accordance with Federal Rule of Evidence 502(d), it is ordered that any
16 disclosure of protected communications or work-product material with the briefing or
17 argument of Bard's upcoming Motion for Protective Order regarding the December 15,
18 2004, report of Dr. John Lehmann shall not constitute a waiver of any such protected
19 communications or work product.

20 SO ORDERED on this ____ day of November 2015.
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